



# THE NAVAJO NATION

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NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

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R09-20-A-008

## Narrative Information Sheet

**FY2020 Site Specific Assessment Grant Application for  
Hazardous Substances Brownfields & Navajo Forest Products Industry Site  
Navajo Nation Environmental Protection Agency  
RFP NO.: EPA-OLEM-OBLR-19-05**

### 1. Applicant Identification

Name: Navajo Nation Environmental Protection Agency, Superfund Program  
Address: P.O. Box 2946  
Window Rock, AZ 86515

### 2. Funding Requested

a. Assessment Grant Type: "Site Specific"

b. Federal Funds Requested

- i. \$350,000
- ii. Indicate if you are requesting a Site-specific Assessment Grant waiver of the \$200,000 limit. Yes.

c. Contamination: \$350,000 Hazardous Substances  
\$0 Petroleum

### 3. Location

- a. Navajo Forest Products Industry site, Navajo, McKinley County, NM
- b. Tribal Trust Land of the Red Lake Chapter of Navajo Nation

### 4. Property Information for Site-Specific Proposals

Property name: Navajo Forest Products Industries  
Complete site address: Navajo Route 12/Cleveland Road & Shepard Springs Road, Navajo, NM  
Zip code: 87328

### 5. Contacts

a. Project Director

Name: Dariel Yazzie, Navajo Nation Environmental Protection Agency  
Phone: (928) 871-6859  
Email: darielyazzie@navajo-nsn.gov  
Mailing address: P.O. Box 2946  
Window Rock, AZ 86515

b. Chief Executive/Highest Ranking Elected Official

Name: Jonathan Nez, Navajo Nation President  
Phone: (928)871-6352  
Email: jonez@navajo-nsn.gov  
Mailing address: PO Box 7440  
Window Rock, AZ 86515

6. Population

Number of tribal members affected: 2,079

7. Other Factors Checklist

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1, 7
The priority brownfield site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The priority site(s) is in a federally designated flood plain.	NA
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	NA
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	NA

8. Letter from the State or Tribal Environmental Authority Since the applicant is the Navajo Nation Environmental Protection Agency, which is Tribal Environmental Authority for Navajo Nation, the requirement for this letter is not applicable.

# **10-PAGE GRANT NARRATIVE**

## 1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

**1.a.i Background & Description of Target Area:** The Navajo Forest Products Industries (NFPI) site and adjacent tribal community of Navajo are located alongside Navajo Route 12 in Navajo, McKinley County, New Mexico which is located on the Navajo Nation (NN) reservation approximately 45 miles northwest of Gallup, New Mexico (Latitude 35054'31.72" North, Longitude 109001'52.50" West [Township 19 North, Range 21 West]). NFPI, owned and operated by the NN was once considered the tribe's most successful enterprise; it manufactured lumber products from 1958 to 1995 and expanded to include a particleboard factory, millworks with machinery support and maintenance shops in 1983. NFPI was a major employer for the tribal community of Navajo, New Mexico and employed 450 local and commuter Navajos. In 1992, the NN Forest Management Plan which had been in effect for 10 years expired, logging operations on tribal land stopped and NFPI began buying timber from off-reservation. Since the cost of importing timber made the facility unprofitable NFPI ceased operations in 1995. The cessation of NFPI operations after 37 years resulted in the immediate loss of 300 jobs for those employed by the facility and this event had a ripple effect that destroyed the economy in the entire area, including closure of businesses that provided services to employees. The area's economy was devastated because the jobs that were wiped out overnight at NFPI and in the businesses servicing NFPI employees were the only income sustaining most families in the local community and for Navajo commuting to the facility.

The legacy of NFPI's closure is a 100-acre abandoned, contaminated property, and a facility that was never properly decommissioned or replaced. with the soil and groundwater at the site contain dangerously high levels of contamination and threatened health and safety. This brownfield dominates the community and creates ripple effects of blight in a community comprised of low income minority residents. Since NFPI closure nearly 25 years ago numerous abandoned "company houses" in Navajo are unoccupied, neglected and unmaintained and 29% of all houses in Navajo vacant. Now these former homes are used as local gang hangouts and have attracted extensive amounts of graffiti. Although Navajo used to be a thriving community with activities for children such as a swimming pool and activity center, without revenue from NFPI, these closed many years ago.

The most recent data show the 5-year unemployment rate in the community is 17.4% compared to 7.7% in New Mexico (NM) which is the closest state and 6.6% in the United States. Even those who have some employment don't have access to higher paying jobs like those at NFPI. Of the 1,676 persons living in Navajo 62.1% live in poverty compared to 40.5% elsewhere in NN, 20.6% in NM and 14.6% in the U.S. Due to this extraordinary need, the Navajo Nation Environmental Protection Agency (NNEPA) is requesting a \$350,000 USEPA Site-Specific Brownfield Assessment Grant to evaluate contamination and plan for cleanup of the NFPI brownfield.

**1.a.ii. Description of the Priority Brownfield Site:** The NFPI site is located on 103.28 acres with ten buildings present out of an original thirty-one during the time that NFPI was operational. The buildings were built in the 1950's and 1960's. NFPI left hazardous chemicals and petroleum contamination of soil and groundwater at as many as 50 different locations/source areas. Potential contaminants of concern (PCOC) include asbestos, paints, cleaners, aerosol cans, adhesives, resins, acids, water treatment chemicals, chlorinated solvents, degreasers and various petroleum-based fuels and lubricants, and formaldehyde. Dissolved phase benzene was detected in 7 of 14 groundwater wells at concentrations from 36 to 15,000 ug/L and there is a two-foot layer of diesel fuel floating on the groundwater in one of the monitoring wells. In addition, there is an estimated 22,000 cubic yards of petroleum contaminated soil which is comingled with asbestos to a depth of two feet. Remediation was performed at the site by UESPA in 1997 and 1998 and by NNEPA almost yearly from 2008 to 2018. However, abandoned structures, open foundations, and other infrastructure or equipment that is physically compromised due to lack of maintenance remain at the site and represent significant risk to residents. There is also risk because there have been reports of illegal entry to the site despite the presence of a fence. Acts of vandalism, illegal dumping and arson have all occurred at the site over the years and these have increased the risk to residents because of the structures and foundations that remain, their flammability and the chemicals they contain.

For purposes of this grant the priority brownfield "site" is the 10 to 12- acre area formerly occupied by the NFPI warehouse and a retail sales office used during the 1980s. Historical information



indicates this location was never used for chemical storage or any NFPI operations that used chemicals. This site is relatively flat and is immediately adjacent to the main highway between Navajo and Window Rock, Indian Route 12. This area is a priority because in addition to being believed to be relatively uncontaminated it contains a 550' x 200' concrete pad that if reused would be the ideal location for a new building.

**1.b.i Reuse Strategy & Alignment with Revitalization Plans:** NN strives for a sustainable and viable economy for growing population now above 300,000. In 1998 the Navajo Nation established the Local Governance Act (LGA) to allow Chapters to make locally-based decisions on their Land Use Plan (LUP) to allow for or increase businesses and new jobs, tourism and increased public awareness. Early planning of NFPI reuse started in 2000 – 2001 with the creation of the Red Lake Chapter (RLC) Community Land Use Plan (LUP - <http://redlake18.navajochapters.org>). The LUP identifies the NFPI site for economic redevelopment. After assessment and cleanup of the NFPI site, the LUP identifies mixed-use development as the goal for future use of the property.

At a chapter meeting held November 20, 2019 to discuss community support for this grant the RLC defined mixed use development as one or more of the following: commercial, cultural, institutional, or entertainment to include adaptive reuse of existing buildings, foundations and concrete slabs from the former NFPI facility. The following objectives for the site were identified: 1) provide community facilities & amenities, 2) enhance economic development (business attraction and business retention) and/or 3) create placemaking (establish this as a destination location). During preparation of this grant application work was performed by the NNEPA to develop a community-driven plan that prioritizes the needs and opportunities available to the Red Lake Chapter for implementation. The plan called the NFPI-Navajo New Enterprise Road Map (Road Map) outlines a series of specific concise activities to be undertaken by the NNEPA, the Red Lake Chapter and/or the tribal community of Navajo NM over a ten-year period to reuse and redevelop the NFPI site as a catalyst for the rebirth of the Navajo NM community providing it with new life and long-term sustainability in a way that respects and honors the community's origins, unique attributes and characteristics, and its traditions. Priority will be given to incorporating bold and innovative ideas suggested by community members that, given enough time and possibly funding, can enhance and improve development opportunities at the NFPI site and remove constraints and limitations to growth of the Navajo community that have existed during the 25 years since closure of the NFPI facility.

During years 1–3 (2020 – 2023) and after sampling and assessment of soil and groundwater at the site are complete, and provided that limited contamination confirm reuse is safe, a Navajo Community Business & Jobs Training Center (NCJC) will be constructed on the existing concrete pad at the site (the area where the forest products storage warehouse and the 1980s retail sale office were previously located) and a community park adjacent to the community center. Funding for the building will consist of a 75% -25% split between two different sources. USDA Community Facilities Direct Loan & Grant Program will provide a grant for 75% of the cost for construction and operation of the building amount and 25% of this cost will come from monetary contributions made by nonprofits and private foundations that are known to fund tribal project such as the Ford Foundation and W.K. Kellogg Foundation. To assist in job business attraction, job creation and workforce development, up to 20% of the assessment grant will be used to perform at least one **Market Analysis** to determine the best business to locate on the site. Priority will be given to businesses that provide reasonable pay and are willing to hire Navajo residents for at least 70% of its workforce. Furthermore, the business must be willing to help develop a curriculum that can be used in the workforce training center or at the site to train Navajo residents for the skills they would need to qualify for management positions. This will include but not be limited to a tire recycling facility and a biomass facility for fuel and wood pellets, which were ideas that were considered once before when there were companies who were interested in NFPI. They withdrew their interest when they realized how costly and time-consuming assessment and cleanup would be. Examples include Southwest Renewable Resources (Snowflake, AZ), Forest Energy Corporation (Show Low, AZ) and Southwest Forest Products, Inc. (Phoenix, AZ). In addition, up to 50% of the community center will be dedicated to a small business incubator and workforce training center. The priority will be to use this facility to help tribal community members create sustainable small businesses that can succeed in the community of

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Navajo and to train local resident to perform the jobs are available in these businesses. NNEPA will also apply for a \$200,000 Environmental Workforce Development and Job Training Grant (EWDJTG) from USEPA in June 2020 to train community members who are interested in working on the NFPI assessment and cleanup for jobs in environmental sampling, demolition, underground storage tank removal, groundwater extraction, and site remediation associated with brownfields. To ensure that the design of the community center incorporates ideas from the community of Navajo, NNEPA will apply for a \$120,000 Environmental Justice Environmental Justice Collaborative Problem-Solving (EJCPS) Cooperative Agreement Program grant from the USEPA and plans to submit an application for this grant on or February 7, 2020.

**1.b.ii. Outcomes & Benefits of a Reuse Strategy:** Reuse of the site for a light industrial facility will create new jobs for local and regional workers. The number of new jobs depends on how much of the site can be reused or redeveloped and the type of development/use that occurs. For example, of the 300 or so Material Recovery Facilities (MRF) in the U.S. many are 30,000 to 70,000 square feet (SF) in size although more than 30 MRFs are larger than 100,000 square feet, with four being over 200,000 square feet (Sortation by the Numbers, Resource Recycling 2018). A 2014 feasibility study for a wood pellet plant on 100 acres of property owned by the Micmac tribe suggests that a facility capable of producing 9800 tons/yr might be possible assuming it operated 3 shifts 7 days per week. The jobs to be created by these facilities are shown below.

Available Area	% Buildout	Facility Type	Size of Facility	Jobs Created <sup>(2)</sup>
103 acres – 12 acres (“site”) = 91 acres	100% (91 acres)	Wood Pellet Plant	1.2 tons/hr <sup>(1)</sup>	13
	1% (~1 acres)	MRF	30,000 SF	19
	2% (~2 acres)	MRF	70,000 SF	43
	3.7% (3.4 acres)	MRF	150,000 SF	93

<sup>(1)</sup>Pre-Feasibility Analysis of Pellet Manufacturing on Former Loring Air Force Base (NREL, 2014). <sup>(2)</sup>Assumes 1,621 square feet per worker based on the USEIA’s 2016 employment estimates.

The local economy would improve with these jobs, dilapidated “company houses” will be demolished and replaced and new housing constructed for workers. New housing will require expansion of neighborhoods and a new source of revenue will be required for refurbishing or maintaining the new homes, and new businesses may be started to provide food or clothing to workers. The return of residents, housing improvements, and redevelopment of the NFPI site will foster hope, ownership, and a sense of community.

**1.c.i. Strategy for Leveraging Resources - Resources Needed for Site Reuse:** As stated in Section 1.b.i the reuse/redevelopment strategy is part of a 10-year road map that is based on the idea that the site specific assessment grant and reuse of the NFPI site will act as a catalyst for reuse of the remainder of the NFPI property and catalyze the rebirth and revitalization of the tribal community of Navajo. Using the initial infusion of the \$350,000 site specific brownfields assessment grant from USEPA as leverage, NNEPA and the Red Lake Chapter are eligible and will be able to secure a minimum of \$3,420,000 which is a Return on Investment (ROI) of 1:10 not including revenue which may be generated as a result of new businesses that are established and operate in Navajo once NFPI cleanup has been completed.

Amount	Source of Funding	Timeframe	Purpose
\$120,000	USEPA Environmental Justice Collaborative Problem-Solving (EJCPS) Grant	Sept. 2020 – Aug. 2022	Provide professional planner & architect to assist Red Lake Chapter and community of Navajo in designing Community Center and community park
\$500,000	USDA Community Facilities Grant Program & Private Foundations & Nonprofits	Sept. 2020 – Sept. 2021	Construction of Navajo Community Center, swimming pool, and community park
\$200,000	USEPA Environmental Workforce Development and Job Training Grant	Sept. 2020 – Aug. 2022	Training in environmental sampling, demolition, underground storage tank removal, groundwater extraction, and site remediation associated with brownfields
\$2,100,000 (some is denoted labor & materials)	Red Feather Construction and/or Habitat for Humanity and/or Navajo Partnership for Housing	2022 – 2025	Demolish, renovate and/or replace 15 deteriorated, dilapidated and unsafe houses @ \$140,000/house.
\$500,000/year	Navajo Tribal Government	2020 –	At the time of this grant application Red Lake Chapter had submitted a petition to the Navajo tribal government for a dedicated funding source to sustain efforts for reuse and redevelopment of the NFPI site.

**Opportunity Zones** are a community development program established by Congress in 2017 to encourage long-term investments in low-income urban and rural communities. RLC and the NFPI site are not located in an Opportunity Zone.

**1.c.ii Use of Existing Infrastructure:** Water, sewer, electrical and/or gas utilities are present at the NFPI site. However, much of what is known to be functional is used by the chapter house of the Red Lake Chapter or other small scale, residential users. The condition and potential to reuse any of the infrastructure that was left behind at the NFPI facility when it shut down in 1995 is unknown and it is likely that some or all of it would require upgrade/replacement, particularly if long-term commercial or industrial reuse of the property is contemplated. The need for upgrade or replacement of utilities and infrastructure at the NFPI site will be specifically included as a line item in the application for any USDA Community Facilities grant that is submitted for funding.

## 2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

**2.a.i. Community Need:** There is greater need for USEPA grant funding to address the NFPI site than at any time since its closure in 1995. Despite recent court settlements to fund environmental work at a fraction of the estimated 500 abandoned uranium mines at Navajo Nation, funding available to the tribal government for assessment, cleanup and redevelopment of brownfields properties is very limited. This is due in part to the economic distress that NN is suffering due to the closure of several coal mines and the Navajo Generating Station, the largest coal fired power plant in the U.S.<sup>1</sup> The economic impact of the mine and plant closure is estimated to be roughly \$20 million to \$30 million for the nation alone. That estimate does not include the impact on surrounding communities. The tribal community of Navajo, NM adjacent to NFPI and the Red Lake Chapter where it is located has significantly less funding available for this work than the tribal government. The tribal community of Navajo is not a township under the NN local governance act (LGA). Therefore, it cannot collect taxes to use for economic or social programs. Taxes have never been collected including during the time when the NFPI was in operation because there was no mechanism to collect taxes. The Navajo Nation Environmental Protection Agency (NNEPA) has spent more than \$1,000,000 performing assessment and some limited cleanup at the site during the 25 years since the closure of the NFPI facility. Chronically underfunded, the NNEPA has insufficient money to make a significant difference in site conditions, let alone start to plan for comprehensive and systematic cleanup and reuse/redevelopment. Work to date has barely been sufficient to address potential exposure of community members to contaminants that remain at the property.

### **2.a.ii: Threats to Sensitive Populations:**

**(1) Health or Welfare of Sensitive Populations:** The Navajo community and the Red Lake Chapter have disproportionately large sensitive populations compared to other areas in NM and the U.S. According to the U.S. Census Bureau, 2005-2009 American Community Survey, 94% of the people living in the community are native. More than 59% of people speak a language other than English at home and 11% do not speak English very well.

The NFPI site is in a rural area with the closest residents approximately 500 feet from an abandoned dump at NFPI. There is a housing development about 800 feet east-southeast of the NFPI site. There is also a charter elementary school that is 500 from the site boundary and grazing areas surround the site. A business area with convenience store, restaurant and grocery store is within 0.5 miles.

Area	Over 65	Over 65 in Poverty	Under 18	Under 18 in Poverty
Navajo NM/ Red Lake Chapter	6.4– 7.5%	29-31%	42.3-44.8%	73.3 – 73.8%
NM	15.8%	11.9%	26.5%	29.1%
U.S.	14.9%	9.3%	25.7%	20.3%

Source: US Census American Community Survey 2017

<sup>1</sup> *Kayenta Mine Layoffs Hit, as Navajo Generating Station Closure Looms* (Indian Country Today/Cronkite News August 24, 2019).

**(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions:** Although there are no reliable and complete studies that provide data about health and disease of the Navajo, NM community and the Red Lake Chapter, the health of this group is anticipated to be similar to from the greater Navajo Nation. Existing data indicate that the Navajo suffer greater health disparities than many other groups in New Mexico or the United States.

<b>Disease and Health Conditions</b> Leading causes of death (per 100,000)	<b>United States<sup>(1)</sup></b>	<b>New Mexico<sup>(2)</sup></b>	<b>Navajo Nation<sup>(3)</sup></b>
Unintentional injury	35.3	72.1	107.73
Cancer	105	174.7	72.49
Heart Disease	198.8	187.3	69.48
Diabetes	25.7 <sup>(4)</sup>	32.6	32.66
Chronic Liver Disease	26.4	28.1	32.09
Suicide	13	25.5	17.05
Asthma (2013-2015) (percent)	14%	9-11%	>20% <sup>(5)</sup>
Infant mortality rates (per 1,000 live births)	6.9	5.7	8.5 <sup>(6)</sup>

<sup>(1)</sup>2016-2018. AZ Vital Statistics Death Data. AZ Cancer Registry. <sup>(2)</sup>New Mexico Epidemiology 11/8/19. <sup>(3)</sup>Navajo Nation Mortality Report, 2006-2009. Navajo Epidemiology Center. <sup>(4)</sup>Centers for Disease Control FastStats 5/3/17. <sup>(5)</sup>Allergic Living 10/18/18. <sup>(6)</sup>The Navajo Birth Cohort Study, Journal of Environmental Health Sept. 2015.

As these data show, residents of Navajo Nation die at a significantly greater rate than elsewhere in NM or the U.S. because of unintentional injuries (traffic accidents, drug overdoses and falls), diabetes and chronic liver disease. One in three Navajo are now diabetic or pre-diabetic. In some regions, health care workers report diagnosing diabetes in 50% of patients. The rate of asthma in children at the Navajo Nation is phenomenally high – at least twice the rate of the U.S. Infant mortality is higher than in NM and the U.S. and the postnatal mortality rate for Navajo is 2.1 higher than the U.S. (Indian Health Service, 2003). Some of these health issues are likely due to the level of poverty that exist in Navajo Nation, and the impact that these conditions have on mental health, and a lack of access to healthy food and exercise. However, they would be exacerbated by living in close proximity to a property like the NFPI site where the soil, water and air is impacted by hazardous substances, pollutants, contaminants and/or petroleum. At the Community Outreach Event 11/20/19 a resident asked what NNEPA was doing about the presence of asbestos at the NFPI site while waiting for award of this grant and wondered what kind of exposure to asbestos fibers from NFPI is occurring every time the wind blows. Using money from the grant, health impacts can will be reduced as contaminants and exposure pathways are mitigated. For example: removal of soil impacts will reduce exposure to hazardous substances from ingestion of particulates and inhalation of vapors; removal of dissolved contaminants that threaten aquifers and surface water will reduce potential exposure to carcinogens; and abatement of asbestos from aging/decaying structures will reduce potential health impacts (asthma and other respiratory diseases). Furthermore, the project will lead to better housing options, employment opportunities and improvements to recreational amenities that will lead to a higher quality of life for area residents. This will in turn improve health indicators such as lack of health insurance, leisure time/physical activity, obesity and poor mental/physical health.

**(3) Disproportionately Impacted Populations:**

The tribal communities of Navajo NM and the Red Lake Chapter which are closest to the NFPI site are some of the most economically impoverished and disproportionately impacted communities in NM and the U.S. They have significantly more poverty and unemployment compared to NM and the USEPA's EJ Screen tool shows that the community of Navajo, NM experiences very high exposure to ozone which may be due to the 45- year operation of the Navajo Generating Station, a coal fired power plant that impacted air quality across the Navajo Nation. In addition, the community is in the 92nd - 99th percentile for Demographic Indexes including minority, low income, populations under 5 years of age and linguistically isolated populations compared to the U.S. Thus, perhaps only a small number of all areas in the U.S. are more economically improvised, disproportionately impacted and isolated when compared to this small community that has suffered the devastating effects of extensive contamination on 20% of the land they have available for development. Health

<b>EJ Index or Demographic Data</b>	<b>Navajo CDP</b>
Ozone	96 <sup>th</sup>
Minority Population	97 <sup>th</sup>
Low Income Population	99 <sup>th</sup>
Population <5 yrs of Age	92 <sup>nd</sup>

*Source: EJSCREEN, USA Percentile EJ Index*

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impacts will be reduced as contaminants and exposure pathways are mitigated. For example: removal of soil impacts will reduce exposure to hazardous substances from ingestion of particulates and inhalation of vapors; removal of dissolved contaminants that threaten aquifers and surface water will reduce potential exposure to carcinogens; and abatement of asbestos from aging/decaying structures will reduce potential health impacts (asthma and other respiratory diseases). Furthermore, the project will lead to better housing options, employment opportunities and improvements to recreational amenities that will lead to a higher quality of life for area residents. This will in turn improve health indicators such as lack of health insurance, leisure time/physical activity, obesity and poor mental/physical health.

**2.b.i. Project Partners / 2.b.ii Project Partner Roles:** In support of this grant application the NNEPA hosted 3 Public Outreach Events in the RLC in the tribal community on the Navajo Nation where NFPI is located on Nov 18, 20, & 22, 2019. The meetings were advertised by placing posters on the community bulletin boards at the chapter house, post office, fire department. Nation's Gas, local restaurant, and by utilizing the chapter web page, word of mouth and the community phone tree. in the manner usual for community meetings and were attended by 7, 38, & 20 community members and guests respectively. At the Nov 20 meeting the RLC unanimously approved a resolution for a ten year "NFPI-Navajo New Enterprise Road Map" designed to ensure the successful reuse and redevelopment of the NFPI site. Attendees confirmed the community's need for site specific assessment funding to identify the nature and extent of NFPI contamination. Community partners pledged to participate in outreach efforts, volunteer for membership in the BAC, and assist with grant implementation activities, such as cleanup planning to facility site reuse. These commitments are reflected in the following table, meeting sign in sheets, and a sign-up sheet completed in response to door-to-door requests for support of the grant made on 11/25/19 and attached to Threshold Criteria information. Project partners will include members of the RLC, community based-organizations, businesses, property owners, government representatives and environmental groups.

Representative List of Project Partners & contact Info (additional community commitments documented in Threshold Criteria which is attached)	Description	Attend Public Meetings	Meeting Space	Meeting Refreshments	Translation Services	Outreach/ Publicity	Brownfield Advisory Committee
Navajo Nation Red Lake Chapter Members; <a href="https://redlake18.navajochapters.org/">https://redlake18.navajochapters.org/</a> ; 505-777-2810	General Public	X	X		X		X
Red Lake/Navajo Community Action Group; <a href="https://www.facebook.com/Places/Navajo-New-Mexico">https://www.facebook.com/Places/Navajo-New-Mexico</a>	CBO	X			X		X
Red Lake Community Economic Development Committee; 218-679-1455	ED	X	X			X	X
McKinley County Volunteer Fire Department; 505-777-2233	ED	X		X		X	
CBO = Community-based organization; ED = Economic development organization							

The plan for involving local community partners in the project includes (1) Listening to collective voices and hear different and unique opinions; (2) Educating residents on facts, ideas, solutions, and resources for brownfield revitalization; and (3) Establishing a Brownfields Advisory Committee (BAC). It is expected that RLC members will be responsible for organizing scheduling meeting of the BAC and making sure that it provides the NNEPA with ideas, interests and concerns expressed by community members. The NNEPA's robust public involvement program will include holding up to 10 community meetings to engage RLC stakeholders and leaders; mailings, press releases, website updates; and articles in local newspapers and/or other publications including but not limited to the Navajo Times. Public information events will ensure outreach efforts include sensitive populations and/or those who live and work in brownfields impacted areas. NNEPA staff will inform the local community about the status of work on this project and will provide updated information every six months. Local newspaper or radio will be used to inform community members and stakeholders about quarterly meeting. The NNEPA staff will coordinate with RLC and local community organizations for meetings and to enhance community participation. The NNEPA staff will develop a community involvement plan for this project. The NNEPA will work with these individuals and organizations through formation of the BAC which will include representatives from RLC and other tribal communities and will meet at

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least two times per year over the three-year grant term. Diverse interests of BAC members will ensure a transparent public process and committed community input throughout the project.

**2.b.iii. Incorporating Community Input:** The NNEPA will tailor outreach methods to the community closest to the NFPI site and ensure equal access to project information for sensitive and underserved populations. The Navajo Times frequently publishes articles about projects that are performed by communities in RLC and reporters regularly attend community meetings. The NNEPA will continue this open-door policy by fostering a transparent relationship with the newspaper and the RLC. In addition to 2+ BAC meetings/yr, the NNEPA anticipates hosting two community outreach events during the first year and 1 to 2 events/yr thereafter and sharing project information (such as factsheet distribution) at ongoing outreach events. NNEPA will assist the RLC with developing a project-specific information webpage hosted on its website to post project information, fact sheets, meeting announcements and minutes. Information about the project will be shared via semi-annual newsletters prepared by the NNEPA that will be distributed by the project partners that have offered to do so. NNEPA will continue its partnership with local newspapers, and local news broadcasters to provide ongoing coverage of the developments with the site assessment grant. Efforts will be made reach residents without internet access and those who have difficulty reading or do not read English. Social media and online forums will also be used to advertise upcoming meetings. The NNEPA and BAC will consider all community comments received about the project and respond, as necessary, through the project website or other appropriate communication. A random sample of comments will be selected for follow-up by telephone to confirm that written response to comments adequately addressed questions and concerns. Time permitting every attempt will be made to respond to questions during meetings at the event and comment cards will be solicited to follow-up if this is not possible. Although most project communications will be published in English, the NNEPA will also provide material in Navajo for tribal elders and non-English speakers. In addition, translation services will be utilized at all public meeting as needed to ensure equal access to project information. In addition, all NNEPA meetings will be ADA-compliant and all project literature will include a statement that citizens may request alternative formats.

<b>3. TASK DESCRIPTION, COST ESTIMATES &amp; MEASURING PROGRESS:</b>
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**3.a. Description of Tasks:** The scope of work has been organized into the four primary tasks described in this section:

<b>Task 1: Cooperative Agreement (CA) Management, Reporting &amp; Other Eligible Activities</b>
<p><b>i. Implementation:</b> This task includes management of all aspects of the project, including coordination with the USEPA, community members, Qualified Environmental Professional (“QEP” or “Consultant”), and other key stakeholders. Reporting will include: 1) Quarterly Progress Reports (QPRs); 2) Property Profiles/ACRES Updates; 3) Annual/Final Disadvantaged Business Enterprise (DBE) and Federal Financial Reports (FFRs); and 4) a Final Project Closeout Report documenting accomplishments, expenditures, outputs, outcomes, and success stories. The budget includes funding for two NNEPA staff to attend one national and one regional brownfield conference.</p> <p><b>ii. Schedule:</b> Management/Reporting will be ongoing during the 3-year implementation period. Monthly calls/meetings will be held between NNEPA and Consultant. Attendance by NNEPA at State or Regional Workshop and National Brownfield Conference is anticipated in 2021.</p> <p><b>iii. Leads:</b> The NNEPA will lead this task and will be responsible for financial management, execution and compliance with the terms and conditions of the CA. The Consultant will assist with reporting activities.</p> <p><b>iv. Outputs:</b> Agendas/minutes from BAC; 12 QPRs; 3 DBE/FFR Reports; ACRES Updates (ongoing); 1 Final Report; 2 Brownfield Conferences attended by NNEPA members.</p>
<b>Task 2: Community Engagement</b>
<p><b>i. Implementation:</b> A detailed description of the methods for engaging the community is provided in Section 2.b. This task includes preparation of the: 1) Community Involvement Plan (CIP); 2) fact sheets and press releases; 3) project webpage (with regular updates); 4) hosting up to 8 Brownfield Advisory Committee meetings (BAC); and 5) hosting additional public outreach and key stakeholder meetings, as appropriate.</p>



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<p><b>ii. Schedule:</b> The CIP, fact sheets and webpage will be developed during the first quarter (1Q) of the project. A BAC kick-off meeting will be held during the second quarter (2Q); BAC meetings will be held quarterly the first year, and semi-annually thereafter; other meetings will occur as needed.</p>
<p><b>iii. Leads:</b> The NNEPA will lead this task, with support from the BAC and the Consultant.</p>
<p><b>iv. Outputs:</b> CIP; fact sheets; press releases/articles; webpage content (updated regularly); 8 BAC Meetings (including presentations, agendas, minutes, etc.); other stakeholder meetings/ materials.</p>
<p><b>Task 3: Phase I/II Env. Site Assessments (ESAs)</b></p>
<p><b>i. Implementation:</b> This task includes (1) the performance of one Phase I ESA in accordance with the All Appropriate Inquiries Final Rule and the standards in the ASTM E1527-13 Phase I ESA Process, (2) completion of a Conceptual Site Model (CSM), and (2) completion of one Phase II ESA. The Phase I ESA will incorporate all the data that has been collected at the site by NNEPA since the last Phase I was completed 7 years ago (Daniel B. Stephens &amp; Associates, Inc. 9/28/12). This task also includes preparation of: 1) one USEPA-approved Quality Assurance Project Plan (QAPP); and 2) one USEPA-approved site-specific Sampling and Analysis Plans (SAPs) and one Health and Safety Plan (HASP) prior to performance of the Phase II ESA. It is assumed that the SAP will include procedures for sampling asbestos containing material (ACM), soil and groundwater.</p>
<p><b>ii. Schedule:</b> Year 1: QAPP, Phase I ESA, 1 SAP   Year 2: Phase II ESA. Because of the need to facilitate site reuse and redevelopment as soon as possible, efforts will be made whenever possible to expedite completion of the project during or prior to Year 2.</p>
<p><b>iii. Lead:</b> The QEP will lead this task under the direction of the NNEPA.</p>
<p><b>iv. Outputs:</b> 1 Master QAPP; 1 Phase I ESA; 1 Phase II ESA.</p>
<p><b>Task 4: Site-Specific Cleanup/Reuse Planning and Area-Wide Planning (AWP)</b></p>
<p><b>i. Implementation:</b> This task includes preparation of one Analysis of Brownfield Cleanup Alternatives (ABCA); and evaluation of institutional and engineering controls for the site, the first area of the NFPI property that will be the focus of future cleanup and reuse/redevelopment. In addition, 2 AWP's will be completed. One will be a market study to assess the best businesses to be located at NFPI, specifically aimed at the two reuse options considered potentially feasible since 2016, in part because an interest was expressed at the time by companies wishing to use the property -- a tire or materials recycling facility and a wood pellet facility. If the results of this study are not encouraging or the presence of additional businesses are desired to diversify the local economy, the 2<sup>nd</sup> AWP will be a market analysis to evaluate the feasibility of attracting others commercial uses.</p>
<p><b>ii. Schedule:</b> Year 2: 1 ABCA; 1 AWP   Year 3: 1 AWP</p>
<p><b>iii. Lead:</b> The QEP will lead the technical elements of this task under direction of NNEPA and in consultation with the BAC.</p>
<p><b>iv. Outputs:</b> 1 ABCA/Site-Specific Reuse Plan; 2 AWP Studies (market analyses).</p>

**3.b. Cost Estimates:** The following table provides a summary of the estimated costs for project outputs by task and budget category. A total of \$320,500 (91.5%) of the project budget of \$350,000 will be spent on assessment and cleanup planning work. The budget for all tasks uses an average rate of \$125/hr for contractual services and each task includes an average combined rate of \$50/hr for NNEPA staff labor (\$30/hr personnel costs + \$20/hr fringe costs = \$50/hr). *The budget assumes that 100% of the grant will be spent for hazardous sites.*

<p><b>Task 1 – CA Management, Reporting &amp; Other Eligible Activities: Total Budget = \$33,000</b></p>
<p><b>Personnel (avg. \$30/hr) + Fringe Costs ( avg. \$20/hr)</b> of <b>\$8,000</b> are budgeted for an estimated 160 hrs of work by NNEPA (combined avg. \$50/hr) in completing CA management and reporting activities. <b>Travel Costs</b> of <b>\$4,000</b> are included and assumes three-day attendance for Pam Maples and Darrel Yazzie to each attend two BF conferences. It includes airfare (\$400/person/conference = \$1,600 total) and hotel, meal, and incidental costs (\$200/person/day/conference = \$2,400 total). <b>Contractual Costs</b> of \$21,000 is budgeted which includes 168 hours @125/hr to assist with reporting and eligible project management activities.</p>
<p><b>Task 2 – Community Engagement: Total Budget = \$33,000</b></p>

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**Personnel + Fringe Costs** of \$8,000 are budgeted for an estimated 160 hrs of work by NNEPA (combined avg. \$50/hr) to lead engagement activities. **Supply Costs** of \$500 are budgeted for printing (\$200) and mailing public notices (\$300). **Contractual Costs** of \$23,500 are budgeted (188 hrs @ \$125/hr) for assisting with outreach activities.

**Task 3 – Phase I and II ESAs: Total Budget = \$203,500**

**Personnel + Fringe Costs** of \$3,500 are budgeted for an est. 70 hrs of work by NNEPA (@ \$50/hr) to oversee the ESA activities. **Contractual Costs** of \$200,000 include costs for the Consultant to complete 1 QAPP (\$7,800); 1 Phase I ESA (\$5,000); 1 SAP (\$3,500); and 1 Phase II ESA (\$183,700).

**Task 4 – Site-Specific Cleanup/Reuse Planning & Area-Wide Planning (AWP): Total Budget = \$192,000**

**Personnel + Fringe Costs** of \$3,500 are budgeted for an est. 70 hrs of work by NNEPA (@ \$50/hr) in coordinating the site-specific plans and AWP studies. **Contractual Costs** of \$78,000 assume the completion by the QEP of 1 ABCAs/Reuse Plan (\$8,000) and 2 AWP's (280 hrs/study @ \$125/hr = \$35,000/study).

A summary of the overall proposed budget is provided on the following table. No indirect or health monitoring costs are requested.

Budget Categories	Task 1: PM & Other Eligible Activities	Task 2: Community Outreach & Involvement	Task 3: Phase I & II ESA	Task 4: Cleanup Planning	Total
Personnel	\$4,800	\$4,800	\$2,100	\$2,100	\$13,800
Fringe	\$3,200	\$3,200	\$1,400	\$1,400	\$9,200
Travel	\$4,000	-	-	-	\$4,000
Supplies	-	\$500	-	-	\$500
Contractual	\$21,000	\$23,500	\$200,000	\$78,000	\$322,500
<b>Total: Petroleum</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Total: Hazardous</b>	<b>\$33,000</b>	<b>\$32,000</b>	<b>\$203,500</b>	<b>\$81,500</b>	<b>\$350,000</b>
<b>Total: Petroleum &amp; Hazardous</b>	<b>\$33,000</b>	<b>\$32,000</b>	<b>\$203,500</b>	<b>\$117,000</b>	<b>\$350,000</b>

The complex nature and the magnitude of contamination at NFPI, the diverse type, number and condition of buildings and other legacy structures, as well as limited USEPA grant and other funding suggest that the three-phase ten-year approach for assessment, cleanup and redevelopment adopted by the RLC is appropriate. This approach will allow for systematic, orderly and well planned reuse and redevelopment of the NFPI site with areas being assessed, cleaned, cleared and reinstated for reuse and redevelopment only after it has been established that it is safe to do so and once community driven and sustainable plans for long-term stewardship are in place. The goal will be to make the process self-sustaining so that the profit from redevelopment occurring during one phase will help to fund assessment during the next phase.

**3.c. Measuring Environmental Results:** To ensure completion of all activities within the grant period, NNEPA and its consultant will establish a project schedule with milestones as part of the Cooperative Agreement (CA) Work Plan for the grant that is submitted to USEPA. The status and estimated date of completion of outcomes identified in 3.b.i and anticipated short- and long-term outcomes will be tracked and reported to USEPA via Quarterly Progress Reports (QPRs), ACRES and the Project Close-Out Report. QPRs will list goals accomplished and activities planned for the next quarter. Any significant deviations in schedule will be discussed with the EPA Project Officer to develop corrective actions. QPR outcomes will be tracked on a project spreadsheet including: 1) # of soil samples tested, 2) # of ACM samples tested, 3) # of groundwater samples tested, 4) number of acres assessed, and 5) # of community meetings. Up to 25 discrete areas (operable units; OU) of the NFPI site will be identified prior to the start of the Phase II ESA. The acreage of each OU will be determined to allow for accurate tracking of progress and the achievement of project outcomes. The following short- and long-term outcomes will be tracked: 1) # of acres assessed, 2) number of acres cleaned up, 3) # of acres of land reused or redeveloped, 4) # of acres of parks/greenspace created, 5) \$ of private investment and other leveraged funding, 6) # of jobs created or retained from redevelopment projects, and (7) increased property value and potential tax revenue. NNEPA will continue to make updates to ACRES beyond the end date, to ensure outcomes are captured as priority brownfields are remediated and redeveloped.



#### 4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

**4.a.i. Programmatic Capability/Organization Structure:** The NNEPA will be responsible for administering all aspects of this grant. The NNEPA was established in 1995. The NNEPA has numerous environmental professionals in the departments of Air & Toxics, Air Quality, Criminal Enforcement, Surface and Groundwater Protection, and Waste Regulatory and Compliance which houses the Superfund, Underground and Leaking Storage Tank Program, and the Brownfields Program. In addition, the NNEPA in coordination with the NN Division of Natural Resources is responsible for 523 Abandoned Uranium Mines (AUM) throughout Navajo Nation. NNEPA Superfund has a team of capable, experienced staff to ensure the timely and successful expenditure of funds to complete all technical, administrative and financial requirements of the grant. Superfund's experienced technical staff have worked side by side with the USEPA to enforce against Responsible Parties to assess and remediate contaminated sites. Staff have also participated in Phase I and Phase II ESAs, and have themselves performed preliminary assessments and site screening. Staff have oversight responsibilities of remediation contractors from the inception of projects by developing scopes of work, critiquing and approval of work plans from contractors, reviewing technical documents, and sampling activities, compiling sample data results, and reviewing reports to ensure activities are compliant with required Tribal and Federal regulations. **4.a.ii Description of Key Staff:** The grant will be administered by **Pam Maples, NNEPA Project Manager** who has 15 years of experience with the NNEPA Leaking Storage Tank Program. This included three years of project management experience and seven years geophysical field technician and five years remediation database design and development. The NNEPA has additional planning, business development, GIS and support staff in other departments in Navajo Nation tribal government. She will be responsible for grant management, administration and reporting and leading community outreach and engagement work. **Contractor Procurement:** Using a qualifications-based procurement process in conformance with 2 CFR 200.317–326 the NNEPA contracted with a consultant in November 2019 to assist in grant implementation. Early procurement of a consultant will position NNEPA for expedited activities upon execution of the Cooperative Agreement (CA) and approval of a CA Work Plan. **4.a.iii. Acquiring Additional Resources:** NNEPA has proactive succession plans should unforeseen events take place, that will eliminate project delays and ensure that any staff that need to be reassigned to the project have appropriate qualifications and experience. In the event additional contractors and/or capabilities are required to assist with grant implementation, NNEPA has a list of Navajo owned prequalified firms that can be retained as subcontractors to their consultant. This should significantly expedite the selection process and immediately provide additional technical resources when or if needed. Other NNEPA Departments can also be used as to provide expertise or assistance as needed.

#### **4.b. Past Performance & Accomplishments/4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:**

**(1) Accomplishments:** The USEPA awarded a Brownfields Pilot Project Assessment Grant of \$200,000 to the NNEPA Superfund Program for the NFPI site in FY97. The grant was completed in FY01. The outcomes of this assessment grant were a Phase I ESA Report of the NFPI site in 2001 with interim progress reports of public outreaches/meetings with NNDED, RLC, the Navajo NM tribal community, and other Stakeholders. The report contained a map of the NFPI buildings, list of chemicals in each, and recommendations for a Phase II ESA. Other outcomes were development of a video tape of the NFPI site activities that was used to educate the community, a Health and Safety Plan, and the development of a draft Sampling Plan that was planned for use in a future Phase II ESA. ACRES did not exist in 1997 and reporting to EPA was not necessary at that time. The grant funds were completely expended but records with additional details about the work that was completed no longer exist.

**(2) Compliance with Grant Requirements:** The NNEPA has complied with all USEPA requirements for financial accounting and reporting for the brownfield grants received previously and has not received any adverse audits. Navajo Nation policies require that the Purchasing Director approve all processes so that all contracts meet procurement requirements of USEPA grants. Internal controls are in existence as multiple approvals occur for all contracts, purchase orders, invoices, and monthly account reconciliation. The Navajo Nation conducts internal audits as needed and also hires external contractors to conduct annual audits.

## **THRESHOLD CRITERIA**



# THE NAVAJO NATION

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

SUPERFUND DIVISION P.O. BOX 2946  
WINDOW ROCK, AZ 86515 · PHONE: (928) 871-7993 · FAX: (928) 871-7783



12/3/19

David Lloyd  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

SUBJECT: **Threshold Criteria for Site Specific Brownfield Assessment Grant  
Navajo Forest Products Industries Site  
Navajo Nation Environmental Protection Agency**

Dear Mr. Lloyd;

Please accept this letter to demonstrate the commitment of Navajo Nation Environmental Protection Agency (NNEPA) to act as the fiscal agent and grantee for the Fiscal Year 2020 Brownfields Site Specific Assessment Grant for the Navajo Forest Products Industries (NFPI) Site in Navajo, New Mexico. The following information is provided to show that this site satisfies all the Threshold Criteria specified in ***FY20 Guidelines for Brownfield Assessment Grants*** (RFP NO.: EPA-OLEM-OBLR-19-05).

NNEPA understands the responsibilities as an EPA brownfield grantee and has the financial and personnel resources to administer a Brownfields Site Specific Assessment grant. We are excited about the opportunity and convinced that this grant would further economic development and environmental cleanup in Navajo Nation.

Sincerely,

Dariel Yazzie  
Navajo Nation Environmental Protection Agency

# Threshold Criteria for Assessment Grants

Information in bold and italics is text from the USEPA FY20 assessment grant guidelines.

## **1. APPLICANT ELIGIBILITY**

***Provide information that demonstrates that you are an eligible entity for an Assessment Grant as specified in Section III.A. of the USEPA FY20 assessment grant guidelines, Who Can Apply?***

The treaty of 1868 established the Navajo Nation as a sovereign nation. The Navajo Nation is a federally Tribe. The applicant for this grant is the Navajo Nation Environmental Protection Agency (NNEPA) part of the Navajo Nation tribal government. CAU-72-72, (Previously codified at 2 N.N.C., § 3401 et seq., but redesignated at 2 N.N.C., §§ 1921-1927.) established The Navajo Environmental Protection Commission on August 10, 1972 and it was in the Natural Resources Department. In 1995, Navajo Nation Council approved legislation for the Navajo Nation Environmental Protection Agency to become a regulatory agency charged with “protection of human health and the environment”. The legislation also transferred the Navajo Nation Environmental Protection Agency to the Executive Branch. Simultaneously in April 1995, the Navajo Nation Council passed a resolution approving the adoption of the Navajo Nation Environmental Policy Act. This Act provided guidance for NNEPA on the protection of air, water and land resources and the recognition that a clean environment contributes to maintaining harmony and balance on the Navajo Nation.

## **2. COMMUNITY INVOLVEMENT**

***Provide information that demonstrates how you intend to inform and involve the community and other stakeholders in the planning, implementation and other brownfield assessment activities described in your grant application.***

The following is described briefly in Sections 2.b.i., 2.b.ii and 2.b.iii of the 10 page grant Narrative.

The plan for involving local community partners in the Navajo Forest Products Industries (NFPI) site assessment project includes (1) Listening to collective voices and hearing different and unique opinions; (2) Educating residents on facts, ideas, solutions, and resources for brownfield revitalization; and (3) Establishing a Brownfields Advisory Committee (BAC) of stakeholders from the Red Lake Chapter (RLC) who will provide the NNEPA with the ideas, interests and concerns expressed by community members. The NNEPA's robust public involvement program will include holding up to 10 community meetings to engage stakeholders and leaders in the RLC; mailings, press releases, website updates; and articles in local newspapers and/or other publications including but not limited to the Navajo Times. Public information events will ensure outreach efforts include sensitive populations and/or those who live and work in brownfield-impacted areas. NNEPA staff will inform the local community about every activity of this project and will provide update information every six months. Local newspaper or radio will be used to inform community members and stakeholders for quarterly meetings. The NNEPA staff will coordinate with RLC and local community organizations for meetings and to enhance community participation. A community liaison will be provided by NNEPA to coordinate with the

## Threshold Criteria for Assessment Grants

community. The NNEPA will provide oversight of the liaison's activities and will review all results submitted by the liaison. In addition, the NNEPA staff will develop a community involvement plan for this project. The NNEPA will work with these individuals and organizations through formation of the BAC which will include representatives from Navajo, NM and other tribal communities and will meet at least two times per year over the three-year grant term. Diverse interests of BAC members will ensure a transparent public process and committed community input throughout the project.

The NNEPA understands the importance of tailoring outreach methods to the community closest to the NFPI site and ensuring equal access to project information for sensitive and underserved populations. The Navajo Times frequently publishes articles about projects that are performed by communities in RLC and reporters regularly attend community meetings. The NNEPA will continue this open-door policy by fostering a transparent relationship with the newspaper and the RLC. In addition to 2+ BAC meetings/year, the NNEPA anticipates hosting 2 to 3 community outreach events during the first year and 1 to 2 events/year thereafter and sharing project information such as factsheets at ongoing outreach events. NNEPA will assist the RLC with developing a project-specific information webpage hosted on its website to post project information, fact sheets, meeting announcements and minutes. Information about the project will be shared via semi-annual newsletters prepared by the NNEPA that will be distributed by the project partners that have offered to do so. NNEPA will continue its partnership with local newspapers, and local news broadcasters to provide ongoing coverage of the developments with the site assessment grant. Efforts will be made to reach residents without internet access and those who have difficulty reading or do not read English. Social media and online forums including Facebook, public notice boards and community day fairs will also be used to advertise upcoming meetings. The NNEPA and BAC will consider all community comments received about the project and respond, as necessary, through the project website or other appropriate communication. A random sample of comments will be selected for follow-up by telephone to confirm that written response to comments adequately addressed questions and concerns. Time permitting every attempt will be made to respond to questions during meetings at the event and comment cards will be solicited to follow-up if this is not possible. Although most project communications will be published in English, the NNEPA will also provide material in Navajo for tribal elders and non-English speakers and Navajo language interpreters and translation services will be utilized at all public meeting to ensure equal access to project information. In addition, all NNEPA meetings will be ADA-compliant and all project literature will include a statement that citizens may request alternative formats.

The following community-based organizations (CBOs) are known to be supportive of the grant:

### neighborhood/citizen groups

1. Navajo Nation Red Lake Chapter members
2. Red Lake/Navajo Community Action Group
3. Former Workers at NFPI

### economic development groups

1. Red Lake Community Economic Development Committee
2. McKinley County Volunteer Fire Department

## Threshold Criteria for Assessment Grants

### environmental groups

1. Red Lake Area Farm Board
2. Red Lake Area Grazing Official
3. Red Lake area Senior Citizens

### workforce development groups and/or educational institutions

1. DEAP Charter School
2. Gallup/McKinley County Schools

### non-profit organizations

1. Navajo Townsite Community Development Corporation
2. Shepherd of the Valley Lutheran Church

### business owners and/or other relevant stakeholders

1. Nation's Gas, Inc.
2. Navajo Shopping Centers, Inc.
3. M.O.B. Construction, LLC.

## **3. EXPENDITURE OF ASSESSMENT GRANT FUNDS**

The Navajo Nation Environmental Protection Agency does not have an active USEPA Brownfields Assessment Grant.

## **4. ADDITIONAL THRESHOLD CRITERIA FOR SITE-SPECIFIC APPLICATIONS ONLY**

In addition to the information provided above which addresses the threshold criteria listed in Section III.B. of the USEPA FY20 assessment grant guidelines, it is understood that applicants applying for Assessment Grant funding for a specific site must provide the following information.

### **1. Basic Site Information**

<b>Property Name</b>	Navajo Forest Products Industries
<b>Complete Site Address</b>	Navajo Route 12/Cleveland Road & Shepard Springs Road, Navajo, NM
<b>Zip Code</b>	87328
<b>Other Location Information</b>	The geographical coordinates of the site are Latitude 35054'31.72" North, Longitude 109001'52.50" West (Township 19 North, Range 21 West).
<b>Operable Unit</b>	For purposes of this grant the operable unit at NFPI site includes the area formerly occupied by the NFPI warehouse and retail sales office.
<b>Owner of the site</b>	Navajo Nation

## Threshold Criteria for Assessment Grants

### 2. Status and History of Contamination at the Site

#### Is site contaminated by hazardous substances or petroleum?

The NFPI site is contaminated predominantly by hazardous substances commingled with petroleum contamination.

#### The operational history and current use(s) of the site

The NFPI site is located on 103.28 acres with ten out of an original thirty-one buildings standing. The buildings were built in the 1950's and 1960's. The NFPI manufactured lumber products from 1958 to 1995 and expanded to include a particleboard factory with machinery support, supplemental power substation, and maintenance shops in 1983. In 1992, the Navajo Nation (NN) ten years Forest Management Plan expired, and logging operations were halted. Meanwhile, the NFPI bought timber from off-reservation. The NFPI closed all operations at the site in 1995 because of the cost of importing timber from off-reservation made it unprofitable to remain in business. The cessation of the NFPI operations at the site significantly damaged the economy in the area when 300 family sustaining jobs were lost. Currently, the NNEPA estimates that thirty percent of community homes are abandoned, vandalized, and/or burnt.

The NFPI site contains abandoned structures, deep open foundations that hold water, and other infrastructure or equipment that is physically compromised due to lack of maintenance. There have been reports of illegal entry despite the presence of a fence. Acts of vandalism are evident. Deterioration of the site may also pose safety risks. The site is a magnet for illegal activities such as arson and illegal dumping. The open abandoned swimming pool is a breeding ground for West Nile Virus. Since 2012, there have been at least two arson fire incidents at the site. One incident destroyed part of the building that the NN Red Lake Chapter (RLC) uses for office space. Besides destroying the physical beauty of the RLC, the site is also contaminated by hazardous chemicals and some of this contamination has migrated into surrounding areas.

The entire site is situated in a valley, in a rural area with the closest residents approximately 500 feet from the NFPI dump site and housing developments about a half mile southeast of the Mill site. There is also a school at the boundary of the site, grazing areas surround the site and business such as convenient store, restaurant, and grocery store are also within 0.5 miles. The grocery store has shut down and the building is now vacant.

#### Environmental concerns at the site

Environmental concerns include drinking water and/or facility water supply wells contaminated with asbestos, heavy metals, benzene and other petroleum contaminants. Soil is contaminated by mercury, heavy metals, pesticides, asbestos, solvents, oil, grease, etc. Discharge of cooling tower blowdown and boiler water into Black Creek and the former sewer lagoons. These discharges may have contained lime, sodium aluminate, soda ash, sulfuric acid, descalants such as hexavalent chromium and algicides. There is also concern

## Threshold Criteria for Assessment Grants

about methylmercury contamination in the sediments, water, and fish of Red Lake. The contents of drums and chemical totes present at the site have been found to contain (or based on labeling formerly contained) ferrous chloride solution, hydraulic fluid, waste oil, diesel, gasoline, antifreeze, mercury, transformer oil, etc.

There is anecdotal evidence of health impacts from the NFPI site. At RLC meetings and home visits, the foremost complaint is breathing problems. The nearby residents have reported that they have asthma in their entire family and they believe the cause is the smoke from the numerous fires at the site, many of which smoldered for days. Residents cite the continually burning NFPI dump site as the main reason for their chronic respiratory problems. Some residents suffer from lung cancer and asbestosis which may be due to presence of asbestos on the Site. Similarly, acute and chronic impacts to nervous, respiratory and reproductive systems and cancer could exist in the RLC community due to presence of petroleum and its products. In addition, the presence of various toxic heavy metals on the Site could have resulted in impaired neurological development of children who live and attend school near the site.

### How the site became contaminated

Operation and abandonment of the NFPI facility without appropriate decommissioning, closure and cleanup left a legacy of hazardous chemicals and petroleum contamination with potential contaminants of concern (PCOC) including asbestos, paints, cleaners, aerosol cans, adhesives, resins, acids, water treatment chemicals, chlorinated solvents, degreasers and various petroleum-based fuels and lubricants. The NFPI generated hazardous wastes during operations from 1958 through 1995. Multiple businesses utilized the abandoned site for scrapping of metal materials from 1999 through 2009. The scrapping of materials might have released toxic heavy metals on site such as mercury, and cadmium. Two large fires have occurred at the site since 1999: one in the Millworks buildings and the other in the Ponderosa Products, Inc. (PPI) building. These fires might have released corrosive or toxic environmental contaminants such as asbestos, carbon fibers, particulates, metals, dioxins and furans, PCBs, benzene etc. Among these contaminants, asbestos was visually observed during the site reconnaissance in 2012. A 1999 site assessment revealed that vandalism and deteriorating containers had resulted the release of substances into the environment.

### The nature and extent of contamination

Greater than 1% asbestos (the level set for defining asbestos containing material) has been discovered in soil in several locations at the site to a depth of two feet below ground surface. Asbestos was also detected (by TEM analysis) in 75-foot deep drinking water and/or production wells at <5 million fibers per liter (MFL) and <19.9 MFL. A two-foot layer of diesel fuel was found floating on the groundwater in monitoring well MW-6. The highest dissolved mercury concentrations in Red Lake was 3.63 ng/L. Dissolved phase benzene was detected in 7 of 14 groundwater wells that were sampled at concentrations from 36 to 15,000 ug/L. There is an estimated 22,000 cubic yards of petroleum contaminated soil



## Threshold Criteria for Assessment Grants

which is comingled with asbestos to at least two feet depth. Additional information about existing contamination at the NFPI site is shown in Table 1.

### 3. Brownfields Site Definition

The NFPI site meets the definition of a brownfield under CERCLA § 101(39) as described in the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k). Thus, the NFPI site is eligible for brownfield grant funding.

The NFPI site **IS NOT** any of the following types of properties (which are not eligible for Brownfields Grant funding):

- facilities listed (or proposed for listing) on the National Priorities List (NPL);
- facilities subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- facilities that are subject to the jurisdiction, custody, or control of the U.S. government.

### 4. Enforcement or Other Actions

*Identify known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought. If there are known ongoing or anticipated environmental enforcement or other actions related to the site, provide information on any inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.*

There are no known ongoing or anticipated environmental enforcement or other actions related to the NFPI site that the NNEPA is aware of regarding the responsibility of any party for the contamination, or hazardous substances at the site, including any liens.

### 5. Sites Requiring a Property-Specific Determination

*Certain types of sites require a property-specific determination in order to be eligible for Brownfields Grant funding. If your site requires a property specific determination, then you must attach the information requested in the FY20 FAQs. If not required, affirm that the site does not need a Property-Specific Determination.*

The NFPI site does not require a Property-Specific Determination. It does **NOT** satisfy any of the following special classes of property:

- properties subject to planned or ongoing removal actions under CERCLA;<sup>(1)</sup>
- properties with facilities that have been issued or entered into a unilateral

## Threshold Criteria for Assessment Grants

administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);

- properties with facilities subject to RCRA corrective action (§ 3004(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures;
- properties that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit;
- properties where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation <sup>(2)</sup>; and
- properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund (see the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) for a definition of LUST Trust Fund sites).

### 6. Threshold Criteria Related to CERCLA/Petroleum Liability

***As stated in Section 6.i of Section III.C. (page 18) of FY20 Guidelines for Brownfield Assessment Grants, "EPA has not considered Indian tribes to be liable under CERCLA and, therefore, tribes are exempt from demonstrating that they meet the requirements of a CERCLA liability defense to be eligible for a Brownfields Grant".***

The NNEPA affirms that the Navajo Nation, as applicant for a Site-Specific Assessment Brownfield Grant is an Indian tribe and is therefore exempt from demonstrating that they meet the requirements of a CERCLA liability defense.

### 7. Waiver of the \$200,000 Limit

NNEPA is requesting \$350,000 in assessment funding for the NFPI. A one-page justification for a waiver of the \$200,000 limit is attached.

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(1) Several removal actions have been performed by USEPA at the NFPI site previously. However, for purposes of this grant the NFPI site will be limited to the area of the NFPI that was the former location of the warehouses and retail sales office. No removal actions have been performed or are planned for this area.

(2) USEPA performed a removal in 1996 – 1997 at the NFPI site of transformers and/or switch gear associated with the NFPI facility, presumably to proactively address the release of PCBs to the environment after the 1995 closure of the NFPI facility. It is not known if any PCBs had been released to the environment prior to this removal action and since the completion of the removal action they have not been detected at the site.

## Threshold Criteria for Assessment Grants

Table 1.

Area	Media	Potential Contaminants of Concern
Power Plant	Soil, air, ground water	Asbestos Containing Material, lime, sodium, mercury, sulfuric acid, hexavalent chromium, solvents, water treatment chemicals
Saw Mill	Soil, Surface, and ground water	ACM, lubricants, PCBs, mercury, pitch solvent
Green Chain: Sorting, Stacking, Pre-Kiln Storage	Soil, air	ACM
Drying Kiln, Cooling Shed & Surrounding area	Soil, air,	ACM
Planer between	Soil, air, ground water	Possible polychlorinated biphenyl, mercury, lubricants, solvents
Resaw, Millwork, Cut Plant	Soil	Possible polychlorinated biphenyl, mercury, lubricants, solvents
Bark Processing Plant	Soil	Lubricants, Solvents
AST Basin	Soil, groundwater	Gasoline, diesel, former ASTs marked “chemicals”
Cooling Tower	Soil, ground water	Acids, lime, sodium, mercury, sulfuric acid, hexavalent chromium
Gasoline Engine Repair Shop	Soil, Groundwater	Stoddard solvent, 1,1,1-Trichloroethane, dichlorobenzene (DCB), lubricants, solvents, anti-freeze, acids, muriatic acid
PPI's Mechanical and Electrical Shop	Soil, Groundwater	Possible polychlorinated biphenyl, mercury, lubricants, solvents, acids, muriatic acid, resins, degreasers, machine oil, asbestos
Electric Shop	Soil	Possible polychlorinated biphenyl, mercury
Water Tower	Soil, Air	Lead
Electric Sub Station	Soil	Possibly PCB's
Warehouse/Small vehicle maintenance (had been the heavy equipment shop until the CAT shop was built)	Soil, ground water	Stoddard solvent, 1,1,1-Trichloroethane, DCB, lubricants, solvents, anti-freeze, muriatic acid, degreasers, brake and transmission fluid, motor oil, asbestos comingled in soil with diesel and gasoline.
CAT/Heavy Equipment	Soil, ground water	Stoddard solvent, 1,1,1-Trichloroethane, dichlorobenzene (DCB), used motor oil, lubricants, solvents, anti-freeze, acids, muriatic acid, brake fluid, hydraulic fluid
Paint Shop and General Maintenance	Soil, Groundwater	Lead, paint thinners, solvents, lubricants
Waste Shavings Receiving		Physical crushing hazard from falling concrete walls.
Particle Board Manufacturing Shavings Prep,	Soil, Groundwater	Cesium-137, Americium-241, Stoddard solvent, 1,1,1-Trichloroethane, dichlorobenzene (DCB), acetone,

## Threshold Criteria for Assessment Grants

Formaldehyde Application Area, Compression-Gluing-Trimming, Vinyl Laminated Particle Board Lime		waste oil, formaldehyde, acetone, adhesives, soluble oil in water mix, hydraulic fluid, machine oil, current physical drowning hazard,
Particle Board Storage: 40	Soil, air, ground water	Possible polychlorinated biphenyl, mercury, formaldehyde
Former sewer lagoons And sediments in the overflow routes from the lagoons	Soil, Groundwater	Multiple discharge permit violations; Boiler blow down water, asbestos, RCRA metals, lime, sodium, mercury, sulfuric acid, hexavalent chromium, polychlorinated biphenyl, resins, degreasers, paint thinners, paints, antifreeze, brake and transmission fluid, motor oil, formaldehyde, Stoddard solvent, 1,1,1-Trichloroethane, dichlorobenzene (DCB), lubricants, other solvents, anti-freeze, acids, muriatic acid...
Drainage via Culvert Beneath Route 12 and ditch Into the Wash and the Wash itself	Soil, Groundwater	Multiple discharge permit violations; Boiler blow down water, asbestos, RCRA metals, lime, sodium, mercury, sulfuric acid, hexavalent chromium, polychlorinated biphenyl, resins, degreasers, paint thinners, paints, antifreeze, brake and transmission fluid, motor oil, formaldehyde, Stoddard solvent, 1,1,1-Trichloroethane, dichlorobenzene (DCB), lubricants, other solvents, anti-freeze, acids, muriatic acid.
Dam on Black Creek	Soil Groundwater	Suspect Boiler Blowdown Water and Hot Lime Process water at least.
Dump: extends 0.9 miles up Black Creek on both sides of the road and onto the flood plain of the creek	Soil, Surface and Groundwater	All of the waste from the NFPI went into the dump. ACM, formaldehyde, DCB, All PCOC's mentioned in this table. Residue from firefighting foam.
Sawdust Disposal Areas, Actual and Suspected	Soil, Surface and Groundwater	Reported unknown areas of disposal of unknown substances throughout this sawdust disposal area. Residue from firefighting foam.
Sediments Above the Dam in Black Creek and the Diversion Channel	Soil, Groundwater	ACM, Anything leachable from the processed waste shavings and the dump; formaldehyde, metals, acids, lime, sodium, mercury, sulfuric acid, hexavalent chromium, Residue from firefighting foam.
6-Facility Supply Wells: #26, #28, #29, #31, and #32	Groundwater	Asbestos, RCRA metals
Red Lake	Surface water, Soil, Edible Fish	Mercury, Other contaminates that have found their way into the lake by the diversion channel or any other means.

**PUBLIC MEETING AGENDAS &  
SIGN-IN SHEETS**



## Red Lake Chapter

**Arval T. McCabe**  
PRESIDENT

**Pauline J. Garnenez**  
VICE PRESIDENT

**Loberta Redhouse**  
SECRETARY/TREASURER  
Florina Howard  
GRAZING OFFICIAL

**RLC-11-19-32**

### RESOLUTION RED LAKE CHAPTER #18

**Resolving and Supporting the NFPI Reuse Plan, Also Called the NFPI-Navajo New Mexico Enterprise Road Map, to Stimulate Economic Development Upon Completion of the Cleanup and Requesting Approval of the Brownsfield Grant Application.**

#### **WHEREAS:**

1. Pursuant to the N.N.C., Section 3 (A), the Red Lake Chapter is a certified chapter of the Navajo Nation as listed under 11NNC., Part I, Section 10; and
2. Pursuant to N.N.C., Section 1 (B) the Red Lake Chapter is delegated to governmental authority to make decision over local matters consistent with Navajo Law, Custom, and Traditions; and
3. Early planning of NFPI reuse started in 2000 – 2001 with the creation of the Red Lake Chapter (RLC) Land Use Plan (LUP). All of the NFPI reuse plans are compatible with the principles included in the Red Lake Chapter LUP; and
4. Future uses of the NFPI site following assessment and cleanup should satisfy one or more of the following objectives: 1) provide community facilities & amenities, 2) create placemaking (establish this as a destination location), and/or 3) enhance economic development (business attraction and business retention), 4) Jobs creation, 5) Workforce development; and
5. Work has been performed by the Navajo Nation Environmental Protection Agency (NNEPA) to develop a community-driven plan that prioritizes the needs and opportunities available to the Red Lake Chapter for implementation. The plan called the NFPI-Navajo New Enterprise Road Map outlines a series of specific concise activities to be undertaken by the NNEPA, the Red Lake Chapter and/or the tribal community of Navajo NM over a ten-year period to reuse and redevelop the NFPI site as a catalyst for the rebirth of the Navajo NM community providing it with new life and long-term sustainability in a way that respects and honors the community's origins, unique attributes and characteristics, and its traditions, attached hereto as Exhibit "A"; and
6. Priority will be given to incorporating bold and innovative ideas suggested by community members that, given enough time and possibly funding, can enhance and improve development opportunities at the NFPI site and remove constraints and limitations to growth of the Navajo community that have existed during the 25 years since closure of the NFPI facility; and
7. The options for NFPI reuse that the Red Lake Chapter has approved for consideration as part of the Road Map to satisfy the objectives stated above is hereby attached as Exhibit "B". Emphasis is on mixed use development that includes one or more of the following elements: commercial, cultural, institutional, or entertainment as well as adaptive reuse of existing buildings, foundations and concrete slabs from the former NFPI facility; and



8. In year 2020 several funding opportunities and financial contributions from USEPA and interested nonprofit organizations and foundations will be pursued to create some momentum and get some early successes. These include the following.

- A USEPA Environmental Justice Collaborative Problem-Solving (EJCPS) Cooperative Agreement Grant to supplement the site-specific USEPA assessment grant being applied for in 2019. One of these is awarded each year per EPA region. They are \$120,000 each. This grant could assist the chapter in decision making over the next three years with respect to land use, reuse, redevelopment on and/or around NFPI over the next three years.
- A USEPA job workforce training grant (JWTG) to supplement the site specific assessment grant being applied for in 2019. These grants are \$200,000 each.
- \$30,000 - \$50,000 for construction of a community center from nonprofits the Vitalyst Health Foundation and/or the Robert Wood Johnson Foundation.
- Construction of new housing to be provided by the nonprofits Habitat for Humanity and/or Red Feather Construction.
- Construction of basketball courts by Project Backboard, a nonprofit that renovates existing public basketball courts.
- Construction of a playground for children by KaBOOM! a non-profit organization that helps communities build playgrounds for children.
- First Nation's Institute Grant for agricultural, entrepreneurial development, cultural, and Sustainability opportunities.; and

**THEREFORE BE IT RESOLVED THAT:**

The Red Lake Chapter hereby approves resolving and supports the NFPI Reuse Plan, also called the NFPI-Navajo New Enterprise Road Map, to stimulate Economic Development upon completion of the cleanup and requesting approval of the Brownsfield Grant Application.

**CERTIFICATION**

We hereby certify that the foregoing resolution was duly considered by the Red Lake Chapter at a duly called regular chapter meeting at Red Lake Chapter, Navajo Nation (New Mexico), at which a quorum was present and that the same was passed by a vote of 25 in favor, 0 opposed, and 02 abstained, on this 20th day of November, 2019.



Arval McCabe, Chapter President

Motioned: Edmund Ciccarello  
Seconded: Christynna Wilson

## **EXHIBIT "A"**

**The NFPI – NAVAJO NEW ENTERPRISE ROAD MAP is as follows:**

### **Year One (October 1, 2020 – September 30, 2021)**

- During this year NNEPA, the Red Lake Chapter and tribal community of Navajo will engage in a series of 4 Charrettes and Visioning sessions to identify and consider the various options for NFPI reuse and revitalization.
- First year (of three) for implementation of USEPA site specific assessment grant #1

### **Year Two (October 1, 2021 – September 30, 2022)**

- Second year (of three) for implementation of USEPA site specific assessment grant #1
- Prepare Analysis of Brownfield Cleanup Alternatives ABCA) for NFPI site
- Start work to apply for USEPA cleanup or multipurpose (MP) grant

### **Year Three (October 1, 2022 – September 30, 2023)**

- Third year (of three) for implementation of USEPA site specific assessment grant #1
- Apply for USEPA site specific assessment grant #2 and cleanup grant OR
- Apply for USEPA MP grant

### **Year Four (October 1, 2023 – September 30, 2024)**

- First year (of three) for implementation of USEPA site specific assessment grant #2 & cleanup grant OR first year (of five) for implementation of USEPA MP grant

### **Year Five (October 1, 2024 – September 30, 2025)**

- First year (of three) of implementation for USEPA site specific assessment grant #2 & cleanup grant OR first year (of five) for implementation of USEPA MP grant

### **Years Six – Ten (October 2025 – September 30, 2030)**

- TBD



## EXHIBIT "B"

### Innovative Ideas and Suggestions by the Community Members for NFPI reuse:

#### **Community Facilities & Amenities**

- New Chapter House
- Community Center
- Safety Shelter
- Better landscaping
- Library
- Music room
- Arts Studios
- Study rooms
- Senior Center
- Park
- Playground
- Jogging track
- Recreation areas appropriate for all age groups
- Basketball courts
- Trees for shade
- Trash/recycle collection
- Wellness and recreational space
- Fitness walk
- Skate park
- Water park/swimming pool
- Laser tag

#### **Economic Development**

- Recycling center
- Laundromat
- Small post office
- Coffee Shop (P)
- Small business incubator
- Computer Lab/internet access
- Educational related space
- Movie theater (P)
- Car wash
- Clinic (CF)
- Businesses that attract tourism
- Hotel
- Outdoor sports opportunities
- RV Park
- Resort/Marina

#### **Placemaking**

- Bull riding arena
- Community gardens
- Agricultural area
- Greenhouse
- Flea market area
- Retail sales leasing area
- Rock climbing wall or gym
- Obstacle course
- Outdoor sports venues
- Dog park
- Frog Rock Tribal/Chapter Park

**Red Lake Chapter #18**  
**EPA Community Redevelopment Planning Meeting**  
**November 18, 2019 @ 8:00 a.m.**

NO.	Name	Phone Number:	Department	Email
1	Pam Maples	928-871-7187	NNEPIA Superfund	pamaples@navajo-nsh.gov
2	Kathy Shudy	505-777-2810	R/C Chapter	kshudy@navajochapters.org
3	Rhonda Jones	505 777-2810	R/C Chapter	redlake18@navajochapters.org
4	Roberta Redhouse	505 567-1117	Red Lake Chap	ljredhouse@yahoo.com
5	Arnell McCann	908-777-2810	Red Lake / DES	arnow7mccann@yahoo.com
6	PJ Garnenez	505-777-2757	Red Lake Chp	pjgarnenez@gmail.com
7	Preston Garnenez			
8				
9				
10				
11				
12				
13				

**Red Lake Chapter #18**  
**NFPI Redevelopment Road Map Approval**  
**November 20, 2019 @ 6:00 p.m.**

NO.	Name	Phone Number:	Organization/Community Member	Email
1	Francis Redhouse		NTUAW-Consultant	
2	Edmund Ciccarello	505730-6199	Comm. member	
3	Elivera Bahe	(928)429-6967	Comm. Member	
4	James Mastach	505-731-5222	Comm. Member	
5	Marietta Jensen	928-871-6584	Comm. member	mjensen@navajo-nsn.gov
6	Theresa Saterally	Jalunne Eyalaaan	CAULLEMS	Jalunne Eyalaaan
7	JERON MASTACH		Red Lake Member	
8	JERICK MASTACH		RED LAKE MEMBER	
9	Eulanda Ciccarello	928 551 0433	Red Lake Comm. Member	eulandaciccarello@gmail.com
10	Basilio Tsabetsayo	928 206 6511	RLC Community Member	
11	Emmy Mould		Red Lake, Az	
12	Marie Compfield	928-206-4925	Red Lake member	—
13	Gary Shumay	928-797-0620	Red Lake member	—



**Red Lake Chapter #18**  
**NFPI Redevelopment Road Map Approval**  
**November 20, 2019 @ 6:00 p.m.**

14				
NO.	Full Name: Print	Phone Number:	Mailing Address:	Date of pick-up:
15	Leon Charles	505-713-0389	BX 683 Navajo, NM	
16	Kathy Skurta	505-777-2810	BX 131 Ft. Def. AZ	
17	Cynthia Iroia	505-406-3126	Box 514 Navajo, N.M.	
18	Brenda Hardy		BX 546 Ft. Def. AZ	
19	Suzanne McElhin	928-206-5525	Box 535 Navajo NM	
20	Chrysanthina McCabe Wilson	928-206-7450	PO Box 2081 Window Rock AZ 86515	
21	QUINTINA TAYAH	(928) 797-5915	P.O. Box #136 Navajo, NM	
22	Anthony Casey	928 349 7040	Po Box 114 Navajo NM	
23	Richard Tsosie	505 777-2810	Po Box 813 Navajo	Community Member
24	DONDI K BEGAH	928-814-5246	P.O. Box 464 NAVAJO NM 86528	Com Member
25	Bob Loria	(928) 206-6549	BX 1834 Ft. Defiance, AZ 86504	Red Lake #18 Community
26	Prestone Garnenez	(505) 777-2757	PO Box 116 Navajo, NM 86528	Community member

**Red Lake Chapter #18**  
**NFPI Redevelopment Road Map Approval**  
**November 20, 2019 @ :00 p.m.**

NO.	Name	Phone Number:	Organization/Community Member	Email
27	Pam Maples	928-871-7187	NNEPA	pamaples@navajo-nsh.gov
28	Darlene Thompson	(505) 593-2509	Community	
29	Ann T McCabe	505 930 0911	President RLC	arunt+mccab@discovery.com
30	Daniel Yazzie	928-871-7325	NNEPA	danielyazzie@navajo-nsh.gov
31	Frederick Sherman	928 871 7923	Navajo EPA/RCRP	fredericksherman@navajo-nsh.gov
32	Monica J. Berchman	505-567-4602	NPRD	monicajayne009@gmail.com
33	Corbin L Francisco	(505) 713 4501	Community	Lanecorbic@yahoo.com
34	Gloria Callen	505 593-6133	"	
35	Roberta Redhouse	505 567-1117	Red Lake Chap #18	ijredhouse@yahoo.com
36	Pauline J Garnenez	505		
37	Flo Howard	505 713 2655	Red Lake	ahedab101@yahoo.com
38	Wilson C Stewart Jr	928-287-6623	24th hnc	wilsonstewartjr@navajo-nsh.gov
39				



**Red Lake Chapter #18**  
**UNM Student Presentation**  
**November 22, 2019 @ :00 p.m.**

NO.	Name	Phone Number:	Organization/Community Member	Email
1	Pam Maples	928-871-7187	NNEPTA Superfund	pmaples@navajo-nsh.gov
2	Taymica Talk	928-206-1704	Student Dine College	
3	Prestene Garmenez	505-777-2757	Red Lake #18 member	pgarmenez@gmail.com
4	RAINELLE MILLER	505 573 3599	UNM Student	rainelle@unm.edu
5	Teara Herrera	505 670 0952	unm student	tearaunm@unm.edu
6	MARY MAYS	505-261-5828	UNM STUDENT	memays@unm.edu
7	Carlos Gomez	202-517-3235	UNM Student	cgomez9@unm.edu
8	JOHN R. OWEN	260-839-1222	UNM	JROWEN@UNM.EDU
9	CATHERINE P. HARRIS	505 205 5165	UNM FACULTY	cp@unm@unm.edu
10	Meljorie Segay		DEAP Student	Msegay22@deapschool.net
11	Mikkel Bia		DEAP Student	mbia21@deapschool.net
12	Kiyana Charley		DEAP Student	Kcharley22@deapschool.net
13	Vidal Barragan		DEAP Teacher	vbarragan@deapschool.org

**Red Lake Chapter #18**  
**UNM Student Presentation**  
**November 22, 2019 @ :00 p.m.**

14				
NO.	Full Name: Print	Phone Number:	Mailing Address:	Date of pick-up:
15	Braxton Benallie	N/A	N/A	N/A
16	Antonio Albert	N/A	N/A	N/A
17	Pauline J. Gomez, <sup>V-P</sup> R/L C/P	505-777-2131		
18	Loberta Redhouse	505-567-1117	POB 322, Navajo NM	
19	Jonas Mastack	505-567-1117	POB 322, Navajo NM	
20	Regina Billy	777-2679	Bx 177 Navajo	
21				
22				
23				
24				
25				
26				

**REQUEST FOR WAIVER OF  
\$200,000 FUNDING LIMIT**



**REQUEST FOR WAIVER OF \$200,000 FUNDING LIMIT**  
**FY2020- Site-Specific Hazardous Substance Brownfield Assessment Grant Application**  
**Navajo Nation Environmental Protection Agency**  
**Navajo Forest Products Industries Site**

**1. Description of the site:** The NFPI site is located on 103.28 acres with ten out of an original thirty-one buildings standing. The buildings were built in the 1950's and 1960's. The NFPI manufactured lumber products from 1958 to 1995 and expanded to include a particleboard factory with machinery support, supplemental power substation, and maintenance shops in 1983. The NFPI closed all operations at the site in 1995 because of the cost of importing timber from off-reservation made it unprofitable to remain in business. The cessation of the NFPI operations at the site significantly damaged the economy in the area when 300 family sustaining jobs were lost.

Currently, the NNEPA estimates that thirty percent of community homes are abandoned, vandalized, and/or burnt. The NFPI site contains abandoned structures, deep open foundations that hold water, and other infrastructure or equipment that is physically compromised due to lack of maintenance. There have been reports of illegal entry despite the presence of a fence. Acts of vandalism are evident. Deterioration of the site may also pose safety risks. The site is a magnet for illegal activities such as arson and illegal dumping. Environmental concerns include drinking water and/or facility water supply wells contaminated with asbestos, heavy metals, benzene and other petroleum contaminants.

Soil is contaminated by mercury, heavy metals, pesticides, asbestos, solvents, oil, grease, etc. Discharge of cooling tower blowdown and boiler water into Black Creek and the former sewer lagoons. These discharges may have contained lime, sodium aluminate, soda ash, sulfuric acid, descalants such as hexavalent chromium and algicides. There is also concern about methylmercury contamination in the sediments, water, and fish of Red Lake. The contents of drums and chemical totes present at the site have been found to contain (or based on labeling formerly contained) ferrous chloride solution, hydraulic fluid, waste oil, diesel, gasoline, antifreeze, mercury, transformer oil, etc.

**2. Why assessment costs exceed the funding limit:** As indicated in the grant application, we have estimated that the project will require \$350,000 to complete. All three primary elements described for our project (Phase II Investigation, Remedial Planning and Re-Use Planning) are viewed as critical to success. Costs are estimated to exceed the funding limit because the Site is relatively large (100 acres) and the environmental site assessment work performed previously needs to be substantially updated with new data. Also, our project success is highly dependent upon incorporating meaningful community involvement to refine a redevelopment plan for the Site.

**3. Circumstances that justify the extra costs:** The Site is a critical piece of economic development planning in Navajo, New Mexico. Redevelopment of the Site is contingent upon eliminating environmental site assessment data gaps and developing a cost-effective cleanup plan. Assessment, cleanup and redevelopment of the Site will provide much-needed economic development, job creation and opportunity for the members of the Red Lake Chapter who have lived with this large contaminated property and abandoned industrial facility for the last 25 years.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

12/02/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name: Navajo Nation Tribal Government, The

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

\* c. Organizational DUNS:

0090017020000

d. Address:

\* Street1:

P.O. Box 2946

Street2:

\* City:

Window Rock

County/Parish:

\* State:

AZ: Arizona

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

86515-2881

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Pam

Middle Name:

\* Last Name:

Maples

Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:

928-871-7187

Fax Number:

\* Email:

pamaples@navajo-nsn.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

\* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Navajo Nation Environmental Protection Agency's Site Specific Assessment Grant for NFPI Site

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

1st

\* b. Program/Project

1st

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2020

\* b. End Date:

09/30/2023

**18. Estimated Funding (\$):**

\* a. Federal

350,000.00

\* b. Applicant

0.00

\* c. State

0.00

\* d. Local

0.00

\* e. Other

0.00

\* f. Program Income

0.00

\* g. TOTAL

350,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Dariel

Middle Name:

\* Last Name:

Yazzie

Suffix:

\* Title:

Program Supervisor

\* Telephone Number:

(928) 871-6859

Fax Number:

\* Email:

darielyazzie@navajo-nsn.gov

\* Signature of Authorized Representative:

Dariel Yazzie

\* Date Signed:

12/02/2019